

# **EXHIBIT K**

Page 1

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

Adv.Pro.No.

v.

08-01789(SMB)

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

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In Re:

BERNARD L. MADOFF,

Debtor.

-----x

IRVING H. PICARD, Trustee for  
the Substantively Consolidated  
SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC  
and Bernard L. Madoff,

Adv.Pro.Nos.  
Listed on  
Exhibit A  
Attached Hereto

Plaintiff,

v.

DEFENDANTS IN ADVERSARY PROCEEDINGS  
LISTED ON EXHIBIT A ATTACHED HERETO,

Defendants.

-----x

Deposition of:

JOANN CRUPI

May 23, 2019

1 Videotaped Deposition of JOANN CRUPI, as  
2 reported by NANCY C. BENDISH, Certified Court  
3 Reporter, RMR, CRR and Notary Public of the  
4 States of New York and New Jersey, at DUANE  
5 MORRIS, One Riverfront Plaza, Newark, New Jersey,  
6 on Thursday, May 23, 2019, commencing at 9:55 a.m.

7  
8  
9 A P P E A R A N C E S:

10 BAKER HOSTETLER, LLP  
11 45 Rockefeller Plaza  
12 New York, New York 10111  
13 BY: JAMES H. ROLLINSON, ESQ.  
14 jrollinson@bakerlaw.com  
15 TERRY BRENNAN, ESQ.  
16 tbrennan@bakerlaw.com  
17 For Plaintiff Irving Picard, Trustee  
18 for the Substantially Consolidated  
19 SIPA Liquidation of BLMIS and the  
20 Estate of Bernard L. Madoff

21 YOUNG CONAWAY STARGATT & TAYLOR, LLP  
22 Rodney Square  
23 1000 North King Street  
24 Wilmington, Delaware 19801  
25 BY: MICHAEL S. NEIBURG, ESQ.  
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TARA C. PAKROUH, ESQ. (p.m. only)  
(Via Telephone)  
tpakrouh@ycst.com  
Co-Counsel for Plaintiff,  
Irving Picard, Trustee

1 A P P E A R A N C E S (Cont'd):

2

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3

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New York, New York 10022

4

BY: HELEN DAVIS CHAITMAN, ESQ.

hchaitman@chaitmanllp.com

5

For a number of Clawback Defendants

6

DUANE MORRIS, LLP

7

One Riverfront Plaza

1037 Raymond Boulevard

8

Newark, New Jersey 07102

BY: ERIC R. BRESLIN, ESQ.

9

ERBreslin@duanemorris.com

For the Witness, Joann Crupi

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11

ALSO PRESENT:

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CHARLES BOWMAN, Videographer

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	EXHIBIT A:	ADVERSARY PROCEEDINGS
	ADV.PRO. NO.	CASE NAME
1		
2		
3		
4	1. 10-04341	Marden, et al.
5	2. 10-04343	Patrice Auld, et al.
6	3. 10-04348	Marden Family Limited Partnership, et al.
7		
8	4. 10-04361	Harvey L. Werner Revocable Trust, et al.
9	5. 10-04384	Lanx BM Investments, LLC, et al.
10	6. 10-04397	Fern C. Palmer Revocable Trust Dtd 12/31/9, et al.
11		
12	7. 10-04417	The Lustig Family 1990 Trust, et al.
13	8. 10-04438	Estate of Seymour Epstein, et al.
14	9. 10-04446	Trust Dated 12/6/99 Walter and Eugenie Kissinger, et al.
15	10. 10-04539	The Gerald and Barbara Keller Family Trust, et al.
16		
17	11. 10-04545	Jerome Goodman, et al.
18	12. 10-04554	David Ivan Lustig
19	13. 10-04561	Jeffrey R. Werner 11/1/98 Trust, et al.
20	14. 10-04610	The Whitman Partnership, et al.
21	15. 10-04655	Jaffe Family Investment Partnership, et al.
22		
23	16. 10-04709	Andrew M. Goodman
24	17. 10-04718	The Jordan H. Kart Revocable Trust, et al.
25	18. 10-04752	Kuntzman Family LLC, et al.

	EXHIBIT A:	ADVERSARY PROCEEDINGS (Cont'd)
	ADV.PRO. NO.	CASE NAME
1		
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4		
5	19. 10-04762	James M. Goodman
6	20. 10-04809	Edyne Gordon NTC
7	21. 10-04823	Frank DiFazio, et al.
8	22. 10-04826	Boyer Palmer
9	23. 10-04837	Leslie Ehrlich f/k/a Leslie Harwood, et al.
10	24. 10-04905	Train Klan, a Partnership, et al.
11	25. 10-04914	Edyne Gordon
12	26. 10-04931	Cantor, et al.
13	27. 10-04961	Sylvan Alssociates LLC f/k/a Sylvan Associates Ltd
14		Partnership, et al.
15	28. 10-04979	James M. 2New Trust dtd 3/19/01, et al.
16	29. 10-04991	Guiducci Family Limited Partnership, et al.
17	30. 10-05048	Estate of Armand L. Greenhall, et al.
18		
19	31. 10-05104	The Gloria Albert Sandler and Maurice Sandler Revocable Living Trust
20		
21	32. 10-05118	Charlotte M. Marden
22	33. 10-05124	The Lawrence J. Ryan and Theresa R. Ryan Revocable Living Trust, et al.
23		
24	34. 10-05127	Atwood Management Profit Sharing Plan & Trust, etc., et al.
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	EXHIBIT A:	ADVERSARY PROCEEDINGS (Cont'd)
	ADV.PRO.	CASE NAME
	NO.	
1		
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5	35. 10-05128	JABA Associates LP, et al.
6	36. 10-05133	Boyer H. Palmer, individually, et al.
7	37. 10-05150	Plafsky Family LLC Retirement Plan, Robert Plafsky, et al.
8	38. 10-05151	Palmer Family Trust, et al.
9	39. 10-05157	The Harnick Brothers Partnership, et al.
10		
11	40. 10-05168	Bernard Marden Profit Sharing
12	41. 10-05194	Bruce D. Pergament, et al.
13	42. 10-05196	Whitman 1990 Trust U/A DTD 4/13/90, et al.
14	43. 10-05384	Neil Reger Profit Sharing Keogh, et al.
15		
16	44. 10-05394	Richard M. Glantz, et al.
17	45. 10-05435	Keith Schaffer, et al.
18	46. 10-05439	Avram J. Goldberg, individually and in his capacity as trust officer
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## 1 I N D E X

2 WITNESS

EXAMINATION

3

JOANN CRUPI

4

By Mr. Rollinson.....9,183

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By Ms. Chaitman.....160,184

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## E X H I B I T S

10 NUMBER

DESCRIPTION

PAGE

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23 (Previously marked Exhibits P-5, P-6,  
 24 P-7, P-14, P-15, P-16, P-27, P-28, P-29, P-33,  
 P-40, P-41 and P-46 were also referenced and are  
 attached hereto.)

25



1 MR. BRESLIN: Answer the question.

2 A. He would have other people write  
3 it up but based on his information that he gave  
4 them.

5 Q. So he would say to someone else,  
6 write up a ticket, I'm buying \$600 million of  
7 T-bills through JPMorgan Chase, or whatever it  
8 was?

9 A. It was never that side of it.  
10 What we did was the allocation of whatever he  
11 did. You know what I mean? If he said there  
12 were 600 million T-bills to buy, he gave the one  
13 slot, the one piece of information at what price  
14 on what day and then he'd tell us if I had to  
15 purchase stuff for, you know, people who were in  
16 my venue, he'd say use this date, this was  
17 bought on this date, and we just allocated to  
18 those certain customers based on his  
19 information.

20 Q. Okay. So he would tell you which  
21 customers to allocate the T-bills to?

22 A. Yes.

23 Q. Now, looking at P-56, do you see  
24 there are two lines that name Norman Levy?

25 A. Yes.

1 ERRATA SHEET

2  
3 WITNESS NAME: JOANN CRUPI

4 PAGE/LINE CHANGE REASON

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1 JURAT

2 I, JOANN CRUPI, have read the  
3 foregoing deposition and hereby affix my  
4 signature that same is true and correct, except  
5 as noted above.

6 \_\_\_\_\_  
JOANN CRUPI

7  
8 THE STATE OF \_\_\_\_\_

9  
10 COUNTY OF \_\_\_\_\_

11 Before me, \_\_\_\_\_, on this  
12 day personally appeared \_\_\_\_\_,  
13 known to me (or proved to me on the oath of or  
14 through \_\_\_\_\_ (description of identity  
15 card or other document) to be the person whose  
16 name is subscribed to the foregoing instrument  
17 and acknowledged to me that he/she executed the  
18 same for the purpose and consideration therein  
expressed.

19 Given under my hand and seal of office on  
20 this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
21

22  
23 \_\_\_\_\_  
NOTARY PUBLIC IN AND FOR  
24 THE STATE OF \_\_\_\_\_

25 My Commission Expires: \_\_\_\_\_.

## 1 REPORTER'S CERTIFICATION

2

3 I, NANCY C. BENDISH, Certified  
4 Court Reporter and Notary Public of the States  
5 of New York and New Jersey, do hereby certify  
6 that, prior to the commencement of the  
7 aforementioned examination, JOANN CRUPI was  
8 sworn by me to testify the truth, the whole  
9 truth and nothing but the truth.

10 I DO FURTHER CERTIFY that the  
11 foregoing is a true and accurate transcript of  
12 the testimony as taken stenographically by and  
13 before me at the time, place, and on the date  
14 hereinbefore set forth.

15 I DO FURTHER CERTIFY that I am  
16 neither a relative nor employee nor attorney nor  
17 counsel of any party in this action and that I  
18 am neither a relative nor employee of such  
19 attorney or counsel, and that I am not  
20 financially interested in the event nor outcome  
21 of this action.

22

23 \_\_\_\_\_  
NANCY C. BENDISH, CCR, RMR, CRR  
24 Realtime Systems Administrator  
Certificate No. XI00836

25 Dated: May 24, 2019